

Exhibit 4

(Document Sought to be Sealed)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,)
Plaintiff,) Case No.
vs.) CV 10-03561 WHA
GOOGLE, INC.,)
Defendant.)
_____) VOLUME I

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED 30(b)(6) DEPOSITION OF GOOGLE, INC.

DESIGNEE: FELIX LIN

Palo Alto, California

Monday, December 14, 2015

Reported by:

KELLI COMBS, CSR No. 7705

Job No. 2196295

Pages 1 - 184

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1 If you'll wait just one moment, I'll put 10:07:00AM
2 an objection in.

3 BY MS. HURST:

4 Q And would you correct my pronunciation of
5 any names if they're wrong today? I don't want to 10:07:07AM
6 offend anyone by getting the names wrong.

7 Is that -- is that all right with you?

8 A Sure. Yes.

9 Q Thank you.

10 And during what period of time did you 10:07:17AM
11 understand Mr. Pichai to be responsible for
12 Chrome OS?

13 MR. RAGLAND: Objection to form.

14 THE WITNESS: Pretty much from the
15 beginning. 10:07:27AM

16 BY MS. HURST:

17 Q Now, in 2009, Google had already created
18 and announced Android; is that correct?

19 A Yes.

20 Q And Android is an operate -- or includes 10:07:39AM
21 an operating system, true?

22 MR. RAGLAND: Objection; form.

23 THE WITNESS: Yes.

24 BY MS. HURST:

25 Q [REDACTED] 10:07:47AM

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[REDACTED]

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MR. RAGLAND: Objection; outside the scope

20

and form.

10:09:59AM

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I'll also take this opportunity to

22

designate the transcript as Highly Confidential,

23

Attorneys' Eyes Only subject to review, as we've

24

been doing in other depositions.

25

THE WITNESS: What was the question again?

10:10:09AM

Page 15

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[REDACTED]

Page 16

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1 [REDACTED] 10:13:14AM

2 BY MS. HURST:

3 Q But you have been able to create a
4 solution that will allow Android applications to run
5 on Chrome OS, true? 10:13:22AM

6 MR. RAGLAND: Objection to form and
7 outside the scope.

8 THE WITNESS: We've managed to get some
9 Android applications running on Chrome OS.

10 BY MS. HURST: 10:13:35AM

11 Q And the -- are you familiar with
12 ARC Welder?

13 A Yes.

14 Q What is ARC Welder?

15 MR. RAGLAND: Objection; outside the 10:13:43AM
16 scope.

17 THE WITNESS: ARC Welder is a tool that
18 allows application developers to try to get their
19 applications running on Chrome OS.

20 BY MS. HURST: 10:13:52AM

21 Q And why did you create ARC Welder?

22 MR. RAGLAND: Same objection.

23 THE WITNESS: We wanted to make it
24 possible for application developers who were
25 familiar and had built Android applications to make 10:14:02AM

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1 encourage developers to write for the form factor, 10:15:09AM
2 so they don't necessarily offer the best solution by
3 simply taking a device -- an application written for
4 a phone and running it on a -- on a larger display.

5 BY MS. HURST: 10:15:22AM

6 Q So then why not simply encourage them to
7 develop for Chrome OS devices? I mean, why offer
8 ARC Welder at all?

9 A We do.

10 MR. RAGLAND: Objection to form and 10:15:31AM
11 outside the scope.

12 THE WITNESS: We do.

13 BY MS. HURST:

14 Q And have you been successful in getting
15 many developers of Android applications to port them 10:15:36AM
16 over to Chrome OS?

17 MR. RAGLAND: Same objections.

18 THE WITNESS: We've seen some success,
19 yes.

20 BY MS. HURST: 10:15:45AM

21 Q Can you approximate how many Android
22 applications have been ported over to Chrome OS
23 without use of ARC Welder?

24 MR. RAGLAND: Objection to form and
25 outside the scope. 10:15:53AM

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23 BY MS. HURST:

24 Q Would you agree that major platform

25 providers in the marketplace are working towards the

10:20:32AM

Page 25

1 the scope. 10:24:00AM

2 THE WITNESS: I see different strategies
3 for different companies playing out.

4 BY MS. HURST:

5 Q My question now is: Thinking forward and 10:24:20AM
6 projecting into the future with the goals for
7 Google, wouldn't you like to have a unified
8 experience for your customers, that is, end user
9 customers, across any device that they may choose to
10 use? 10:24:35AM

11 MR. RAGLAND: Objection to form, outside
12 the scope.

13 THE WITNESS: Google tries to make its
14 applications available on all platforms, yes.

15 BY MS. HURST: 10:24:44AM

16 Q And how does Google make money?

17 MR. RAGLAND: Objection; outside the
18 scope, form.

19 THE WITNESS: Today, Google primarily
20 makes money from advertising. 10:24:57AM

21 BY MS. HURST:

22 Q And in what forms does Google deliver the
23 advertising from which it makes that money?

24 MR. RAGLAND: Same objections.

25 THE WITNESS: Largely online. 10:25:08AM

1 BY MS. HURST:

1:28:38PM

2 Q Did Exhibit 5089, this article, did it
3 prompt any discussion on your part with anybody else
4 at Google about the information contained therein?

5 MR. RAGLAND: Objection to form and beyond 1:28:48PM
6 the scope.

7 THE WITNESS: Other -- other people on the
8 team saw it. I think, in general, people thought it
9 was an interesting analysis but, you know, there
10 wasn't really any discussion beyond that. 1:29:05PM

11 MS. HURST: Exhibit 5090 is a Wall Street
12 Journal article dated October 29, 2015, entitled
13 "Alphabet's Google to Fold Chrome Operating System
14 into Android."

15 (Deposition Exhibit 5090 marked 1:30:02PM
16 for identification.)

17 BY MS. HURST:

18 Q Mr. Lin, did you read this article on or
19 about the time it was published?

20 A I did. 1:30:30PM

21 Q And what was your reaction to it at the
22 time?

23 MR. RAGLAND: Objection; outside the
24 scope.

25 THE WITNESS: My impression was that 1:30:44PM

1 somebody who had done some analysis was completely 1:30:46PM

2 misreading what was actually going on.

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1:30:46PM

Page 107

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10 BY MS. HURST: 1:34:06PM

11 Q What was the goal of creating ARC Welder?

12 MR. RAGLAND: Objection to scope.

13 THE WITNESS: Are you asking about the

14 technical goal or what -- what do you mean?

15 BY MS. HURST: 1:35:09PM

16 Q Well, let's start with the technical goal.

17 MR. RAGLAND: Same objection, also to

18 form.

19 THE WITNESS: The technical goal was to

20 just make it easier for application developers to

21 put the finishing touches on Android applications so

22 that they could run on Chrome OS.

23 BY MS. HURST:

24 Q What were the bus- --

25 What was the business goal or goals of

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17 BY MS. HURST:

18 Q Is there some version of Android that's

19 API-level version that's been released where ARC

20 does support all of the libraries?

1:42:19PM

21 MR. RAGLAND: Same objections.

22 THE WITNESS: I don't know that we have

23 produced that or that it's been made available, no.

24 BY MS. HURST:

25 Q Which -- which libraries are not

1:42:33PM

Page 115

1 there. It's just a matter of getting application 1:43:45PM
2 developers to make their applications at the margin
3 work. I just don't know for certain, one way or the
4 other.

5 BY MS. HURST: 1:43:56PM

6 Q And is it your goal and plan to get
7 application developers to do the work to support
8 Android on Chrome OS using ARC Welder or otherwise?

9 MR. RAGLAND: Objection to form and beyond
10 the scope of noticed topics. 1:44:11PM

11 THE WITNESS: I think if we could make it
12 possible for every Android application to run on
13 Chrome OS without any developer work, that would be
14 phenomenal; just like I think Microsoft would love
15 to have every Android application running on 1:44:30PM
16 Windows, and I suspect, at least customers who are
17 using iPhones, would love to have all the Android
18 apps that aren't currently running on iPhones
19 available to them on iPhones as well.

20 BY MS. HURST: 1:44:53PM

21 Q Does ARC support Google Play Services?

22 MR. RAGLAND: Objection; beyond the scope.

23 THE WITNESS: I don't know the answer to
24 that.

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were administered an oath; that a record of
7 the proceedings was made by me using machine shorthand
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, a review of the
14 transcript [X] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: 12/16/2015

22
23 Kelli Combs
24

25 KELLI COMBS

CSR No. 7705